UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - - - - - - - - - - - - - - -x

UNITED STATES OF AMERICA

                                      :

        - v. -

                                        :

JAMES EARLY,

                                        :

              Defendant.

- - - - - - - - - - - - - - - - - - x

SUPERSEDING INFORMATION

S1 18 Cr. 819 (KMK)

COUNT ONE

(Coercion and Enticement)

The United States Attorney charges:

1. From at least in or about July 2015 up to and including in or about March 2017, in the Southern District of New York and elsewhere, JAMES EARLY, the defendant, using facilities and means of interstate and foreign commerce, willfully and knowingly persuaded, induced, and enticed an individual who had not attained the age of 18 years to engage in sexual activity for which a person can be charged, to wit, JAMES EARLY, the defendant, communicated online with a minor in Sullivan County, New York ("Victim-1") and persuaded Victim-1 to engage in sexually explicit conduct, photograph the conduct and transmit the photos, via text messages, to EARLY.

(Title 18, United States Code, Sections 2422(b) and 2427.)

COUNT TWO

(Coercion and Enticement)

The United States Attorney further charges:

2.   From in or about Fall of 2014 up to and including in or about Spring 2017, in the Middle District of Pennsylvania and elsewhere, JAMES EARLY, the defendant, using facilities and means of interstate and foreign commerce, willfully and knowingly persuaded, induced, and enticed an individual who had not attained the age of 18 years to engage in sexual activity for which a person can be charged, to wit, on numerous occasions, JAMES EARLY, the defendant, engaged in cellphone communications with a minor ("Victim-2") by which he persuaded, induced and enticed Victim-2 to meet EARLY in the Middle District of Pennsylvania and engage in sexual activities with EARLY, which EARLY recorded.

(Title 18, United States Code, Sections 2422(b) and 2427.)

FORFEITURE ALLEGATION

3.   As a result of committing the offenses alleged in Counts One and Two of this Information, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2428, any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of said offense; and any and all property, real or personal, that was used or intended to be

used to commit or facilitate the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense and the following specific property:

a)   one Sandisk thumb drive (USB 3.0 128GB);

b)   one Samsung tablet with serial number R52F60ATHZW;

c)   one Alienware laptop with service tag/serial number CGPCN72;

d)   one HP Desktop computer with serial number 3CR1030WXX;

e) one Seagate hard drive, model #8T380011A, with serial number 3JV6AEFP;

f) one HP laptop with serial number 5CB402315C;

g) one Western Digital hard drive with serial number SCANU1554927.

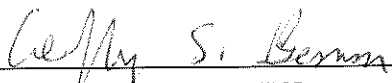## Substitute Assets Provision

4.   If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a)   cannot be located upon the exercise of due diligence;

b)   has been transferred or sold to, or deposited with, a third person;

c)   has been placed beyond the jurisdiction of the Court;

d)   has been substantially diminished in value; or

e)   has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21,

United States Code, Section 853(p), and Title 28, United States

Code, Section 2461(c), to seek forfeiture of any other property

of the defendant up to the value of the above forfeitable

property.

(Title 18, United States Code, Section 2428;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)

GEOFFREY S. BERMAN
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v -

JAMES EARLY,

Defendant.

INFORMATION
S1 18 Cr. 819

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